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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

MELISSA FIRESIDE,

Case No. 3:17-cv-00234-YY

Plaintiff,

v.

DECLARATION OF BRIAN DONALDSON  
IN SUPPORT OF DEFENDANT'S MOTION  
TO DISMISS

COLLEGE FOR AMERICA, SOUTHERN  
NEW HAMPSHIRE UNIVERSITY, New  
Hampshire non-profit educational  
institution,

Defendant

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I, Brian Donaldson, declare and state as follows:

1. I have personal knowledge of the facts set forth in this declaration and I am competent to testify to the matters stated in this declaration.

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2. I am the Controller at Southern New Hampshire University ("SNHU"). I work out of SNHU's offices in Manchester, New Hampshire.

3. In fiscal year 2016, SNHU reported \$ 581,366,224 in total revenue.

4. In fiscal year 2016, SNHU reported \$ 3,119,185 in revenue in Oregon.

In accordance with 28 USC § 1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this 16<sup>th</sup> day of February, 2017, in Manchester, NH.



Brian Donaldson

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4825-5652-3843.1

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